

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

RONALD JOHNSON,)
Plaintiff,)
-vs-) No. 05 C 6545
CITY OF CHICAGO, CHICAGO)
POLICE OFFICERS CHRISTOPHER)
KATALINIC, ROBERT MCHALE,)
LOUIS GARCIA, CRAIG)
BROWNFIELD, CURTIS HINKLE,)
SHAUN WILLIAMS, NICHOLAS)
WHITE, JIM WALSH, and)
UNKNOWN CHICAGO POLICE)
OFFICERS,)
Defendants.)

ORIGINAL

Deposition of CRAIG BROWNFIELD, taken before
NICOLE C. JONES, C.S.R., and Notary Public, pursuant
to the Federal Rules of Civil Procedure for the
United States Courts pertaining to the taking of
depositions, at Suite 100, 312 North May Street,
Chicago, Illinois, commencing at 10:25 a.m., on the
24th day of January, 2007.

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M E R R I L L L E G A L S O L U

230 West Monroe St., Suite 1500
Chicago, IL 60606

EXHIBIT

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1 There were present at the taking of this
2 deposition the following counsel:

3

4 LOEVY AND LOEVY by
5 MS. SAMANTHA LISKOW
6 312 North May Street
7 Suite 100
8 Chicago, Illinois 60607
9 (312) 243-5900

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 on behalf of the Plaintiff;

11

12 CITY OF CHICAGO
13 ASSISTANT CORPORATION COUNSEL by
14 MS. PATRICIA KENDALL
15 30 North LaSalle Street
16 Suite 1400
17 Chicago, Illinois 60602
18 (312) 742-6433

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 on behalf of the Defendants.

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DEPOSITION OF
CRAIG BROWNFIELD

January 24, 2007

EXAMINATION BY:

PAGE

Ms. Liskow

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EXHIBITS

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Exhibit B

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1 drive to work with Officer Garcia when you worked on
2 patrol?

3 A I don't believe so.

4 Q But you were working with Officer Garcia
5 that day?

6 A Yes, if the roster says, yes.

7 Q What's the first thing you remember about
8 your shift, first thing you remember happening on
9 your shift on April 17, 2005?

10 A I'd have to say pulling up to the assist
11 call for Officers McHale and Katalinic.

12 Q Do you remember where you were when you
13 received the assist call?

14 A Not an exact location, no.

15 Q Were you in a car?

16 A I believe so, yes.

17 Q Were you driving or was Officer Garcia
18 driving?

19 A I don't recall at this time.

20 Q So you two would switch off driving duties
21 when you worked together?

22 A On a normal basis that's usually what
23 happens, yeah.

24 Q What do you remember about the assist call?

1 MS. KENDALL: You mean the call itself or
2 responding to it? Objection, form of the question.

3 MS. LISKOW: Q The call -- and I am referring
4 to the call itself.

5 A I don't recall if it was the dispatcher that
6 came over with it or one of the officers in the foot
7 pursuit.

8 Q What was the content of the call? What was
9 said?

10 A I'm not quite sure of the exact content, but
11 something to the effect of that they were chasing
12 the subject and needed assistance.

13 Q But you don't know if the voice of the
14 person making the call was that of one of the
15 officers who needed assistance or a dispatcher; is
16 that correct?

17 A I don't know at this time if we heard the
18 dispatcher or if it was one of the officers and then
19 the dispatcher was just relaying the information.
20 That's what I can't recall which one we heard first.

21 Q When you said which one you heard first,
22 does that mean you heard more than one call?

23 A I really couldn't say at this time.

24 Q Do you remember that call or are you -- has

1 A I believe it was on the west side of the
2 street.

3 Q What's the first thing that you recall
4 seeing when you arrived at 7630 South Euclid?

5 A I remember Mr. Johnson sitting on the front
6 porch of 7630 South Euclid and Officer Katalinic and
7 Officer McHale standing around him.

8 Q How exactly were they standing around him?

9 A In his general area.

10 Q Were they making any physical contact with
11 him?

12 A Not that I recall, no.

13 Q Did they seem to be making sure he didn't go
14 anywhere?

15 A At the time Mr. Johnson was already
16 handcuffed.

17 Q So Officer Katalinic and McHale when you
18 first saw them, they were just standing?

19 A Yes.

20 Q They weren't doing anything in particular?

21 A Not that I recall, no.

22 Q What did the front porch look like?

23 A From what I remember it was either a
24 one-step or two-step kind of stoop off the ground,

1 Q Did any officer that was on the scene at
2 7630 South Euclid April 17, 2005 to your knowledge,
3 go into that building except for Officer McHale?

4 A No.

5 Q So you didn't go into the building?

6 A I did not, no.

7 Q Do you know whether there was anything
8 happening in the building or any information any of
9 the officers on the scene had that day at
10 7630 South Euclid that would have justified entering
11 that residence without a warrant?

12 MS. KENDALL: Objection, form of the question.

13 THE WITNESS: Could you rephrase it?

14 MS. LISKOW: Q Sure. Do you know of any reason
15 for any officers to go into that building without a
16 warrant on April 17, 2005?

17 A No, I was not aware of anything.

18 Q During the entire two- to seven-minute
19 conversation that you observed happening between
20 Officer McHale and the women, did you or any of the
21 other officers or Ronald Johnson move from the
22 stoop?

23 A From what I recall me and Officer Garcia
24 stood on the stoop with Mr. Johnson, and I can't say

1 look at them?

2 A Not that I recall right now.

3 Q What were you -- Were you in uniform that
4 day?

5 A Yes, I was.

6 Q And Officer Garcia was in the same uniform?

7 A He was in a general uniform. I don't know
8 if he was exactly dressed the same as I was.

9 Q And what was your uniform that day?

10 A If I had to guess, a blue short-sleeved
11 shirt with the blue vest cover and blue pants.

12 Q Do you have a holster?

13 A Yes.

14 Q With a gun?

15 A Yes.

16 Q And what else would you have had on or did
17 you have on your holster?

18 A On my holster?

19 Q Or, well, do you have some sort of like belt
20 that you kept -- that you put things on?

21 A Yes.

22 Q What else did you have on that?

23 A On a normal day, an extra magazine pouch, a
24 flashlight holder with a flashlight, an OC spray

1 A From what I recall the only officers there
2 were Officer McHale, Officer Katalinic, myself, and
3 Officer Garcia.

4 Q Did you see any officers drive by the scene?

5 A From what I recall, no.

6 Q Did you ever hear at any point from when you
7 first got the call, you know, for assistance to any
8 time on the rest of your shift on April 17, 2005
9 that any other officers planned to respond to the
10 scene?

11 MS. KENDALL: Objection, form of the question.

12 THE WITNESS: We might have, but I can't recall
13 right now.

14 MS. LISKOW: Q So you don't recall hearing any
15 dispatch calls or anything like that from another
16 group of officers saying they were coming to the
17 scene?

18 A We might have, but I don't recall right now.

19 Q So when Officer McHale came out of the
20 building, what's the next thing that you remember
21 happening?

22 MS. KENDALL: Objection, asked and answered.

23 THE WITNESS: I don't know for sure, but him
24 exiting the building and I think he assisted me and

1 Officer Garcia to walk Mr. Johnson to our squad car.

2 MS. LISKOW: Q Did Officer Katalinic assist the
3 three of you also?

4 A He might have, but I can't say for sure.

5 Q And why were three of you walking
6 Officer Johnson to the squad car -- or sorry,
7 Ronald Johnson to the squad car?

8 A That's -- in most cases it's an officer's
9 decision if he wants to help another officer walk a
10 prisoner to the car or not.

11 Q But was there some need for three officers
12 to help Mr. Johnson to the car?

13 A Not that I recall, no.

14 Q Do you remember how Mr. Johnson was sitting
15 when he was sitting on the stoop like cross-legged
16 or on his knees or anything?

17 A Sitting up straight. I can't recall if his
18 legs were crossed or not or straight.

19 Q Did he seem to be sitting in a natural
20 position?

21 MS. KENDALL: Objection, form of the question.

22 THE WITNESS: Natural as in?

23 MS. LISKOW: As in uncomfortable.

24 MS. KENDALL: Objection, form of the question.

1 A That was 76th Street, our station is on
2 103rd Street.

3 Q And what?

4 A Luella.

5 Q Well, how long in driving distance is it
6 approximately?

7 A In time?

8 Q In time, yes.

9 A Varies from, you know, each day and if it
10 was rush hour, but on average I'd say 10 to 15
11 minutes.

12 Q Did you and Officer Garcia go straight to
13 the station with Johnson?

14 A I believe so, yes.

15 Q Did you have any conversation with
16 Mr. Johnson while you were going to the station?

17 A Not that I recall, no.

18 Q Did Officer Garcia say anything to
19 Mr. Johnson?

20 A Not that I recall, no.

21 Q So do you recall Mr. Johnson just being
22 quiet in the back seat?

23 A Yes.

24 Q What's the next thing you remember

1 happening?

2 A Vaguely remember pulling into the station
3 and escorting Mr. Johnson into the station.

4 Q Where in the station did you escort him?

5 A Their office would be in the rear of the
6 building.

7 Q Whose office?

8 A Officer McHale and Officer Katalinic.

9 Q So the first place you took Mr. Johnson was
10 Officers McHale and Katalinic's office?

11 A I believe so, yes.

12 Q And why did you take him there?

13 A That's where those officers do their
14 processing.

15 Q Was Officer Garcia with you when you went to
16 McHale's office?

17 A I believe so, yes.

18 Q What's the next thing that happened?

19 A Vaguely remember turning Mr. Johnson over to
20 Officer McHale and Officer Katalinic and going back
21 on patrol.

22 Q So McHale and Katalinic were already in
23 their office when you got there with Mr. Johnson?

24 A I believe so, yes.